



MAJOR SOURCE OPERATING PERMIT

Permittee: American Foam Cast, Inc.

Facility Name: American Foam Cast, Inc.

Facility No.: 309-0044

Location: Sylacauga, Alabama

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, <u>Ala. Code</u> §§22-28-1 to 22-28-23 (2006 Rplc. Vol. and 2007 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, <u>Ala. Code</u> §§22-22A-1 to 22-22A-15 (2006 Rplc. Vol. and 2007 Cum. Supp.), and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Issuance Date: DRAFT

Expiration Date: DRAFT

Alabama Department of Environmental Management

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Fed	erally	Enforceable Provisos	Regulations
1.	Tran	nsfer_	
	or of piec anot	permit is not transferable, whether by operation of law therwise, either from one location to another, from one e of equipment to another, or from one person to ther, except as provided in ADEM Admin. Code R. 335-3-13(1)(a)5.	ADEM Admin. Code R. 335-3-1602(6)
2 .	Ren	<u>ewals</u>	
	six (application for permit renewal shall be submitted at least 6) months, but not more than eighteen (18) months, re the date of expiration of this permit.	ADEM Admin. Code R. 335-3-1612(2)
	to o _l and	source for which this permit is issued shall lose its right perate upon the expiration of this permit unless a timely complete renewal application has been submitted in the time constraints listed in the previous paragraph.	
3.	Seve	erability Clause	
	and clau inva juris inva conf subj	provisions of this permit are declared to be severable if any section, paragraph, subparagraph, subdivision, se, or phrase of this permit shall be adjudged to be lid or unconstitutional by any court of competent ediction, the judgment shall not affect, impair, or lidate the remainder of this permit, but shall be fined in its operation to the section, paragraph, paragraph, subdivision, clause, or phrase of this permit shall be directly involved in the controversy in which in judgment shall have been rendered.	ADEM Admin. Code R. 335-3-1605(e)
4.	Con	<u>npliance</u>	
	(a)	The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.	ADEM Admin. Code R. 335-3-1605(f)
	(b)	The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.	ADEM Admin. Code R. 335-3-1605(g)

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5.	<u>Termination for Cause</u>	
	This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.	ADEM Admin. Code R. 335-3-1605(h)
6.	Property Rights	
	The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.	ADEM Admin. Code R. 335-3-1605(i)
7.	Submission of Information	
	The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.	ADEM Admin. Code R. 335-3-1605(j)
8.	Economic Incentives, Marketable Permits, and Emissions Trading	
	No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.	ADEM Admin. Code R. 335-3-1605(k)
9.	Certification of Truth, Accuracy, and Completeness:	
10.	Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete. Inspection and Entry	ADEM Admin. Code R. 335-3-1607(a)
	Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of Environmental Management and EPA to conduct the following:	ADEM Admin. Code R. 335-3-1607(b)
	(a) Enter upon the permittee's premises where a source	

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		or w	cated or emissions-related activity is conducted, here records must be kept pursuant to the litions of this permit;	
	(b)		ew and/or copy, at reasonable times, any records must be kept pursuant to the conditions of this nit;	
	(c)	(inclucion)	ect, at reasonable times, this facility's equipment uding monitoring equipment and air pollution rol equipment), practices, or operations regulated quired pursuant to this permit;	
	(d)	or pa	ple or monitor, at reasonable times, substances arameters for the purpose of assuring compliance this permit or other applicable requirements.	
1.	Com	plianc	<u>e Provisions</u>	
	(a)	appli	permittee shall continue to comply with the icable requirements with which the company has fied that it is already in compliance.	ADEM Admin. Code 1 335-3-1607(c)
	(b)	appli	permittee shall comply in a timely manner with icable requirements that become effective during erm of this permit.	
2.	Com	plianc		
	Mar ebetw	ch 4th (ce certification shall be submitted on or before of each calendar year and shall cover the period nuary 4 th of the previous year and January 3 rd of year.	ADEM Admin. Code 1 335-3-1607(e)
	(a)	The of	compliance certification shall include the wing:	
		(1)	The identification of each term or condition of this permit that is the basis of the certification;	
		(2)	The compliance status;	
		(3)	The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with ADEM Admin. Code R. 335-3-1605(c) (Monitoring and Recordkeeping Requirements);	
		(3)	compliance status of the source, currently and over the reporting period consistent with ADEM Admin. Code R. 335-3-1605(c) (Monitoring	

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	(b)	The compliance certification shall be submitted to:	
	Alab	pama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463	
		and to:	
		Air and EPCRA Enforcement Branch EPA Region IV 61 Forsyth Street, SW Atlanta, GA 30303	
13 .	Reo	pening for Cause	
		er any of the following circumstances, this permit will be ened prior to the expiration of the permit:	ADEM Admin. Code R. 335-3-1613(5)
	(a)	Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.	
	(b)	Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.	
	(c)	The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.	
	(d)	The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.	
4.	<u>Addi</u>	tional ADEM Admin. Code R.s and Regulations	
	and even are a	permit is issued on the basis of ADEM Admin. Code R.s Regulations existing on the date of issuance. In the t additional ADEM Admin. Code R.s and Regulations adopted, it shall be the permit holder's responsibility to ply with such ADEM Admin. Code R.s.	§22-28-16(d), Code of Alabama 1975, as amended

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15.	Equi	ipmen	t Maintenance or Breakdown		
	(a)	equi issue main equi twen shut the s inter	ne case of shutdown of air pollution control pment (which operates pursuant to any permit ed by the Director) for necessary scheduled atenance, the intent to shut down such pment shall be reported to the Director at least aty-four (24) hours prior to the planned adown, unless such shutdown is accompanied by shutdown of the source which such equipment is added to control. Such prior notice shall include, is not limited to the following:	ADEM Admin. Code R. 335-3-107(1), (2)	
		(1)	Identification of the specific facility to be taken out of service as well as its location and permit number;		
		(2)	The expected length of time that the air pollution control equipment will be out of service;		
		(3)	The nature and quantity of emissions of air contaminants likely to occur during the shutdown period;		
		(4)	Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;		
		(5)	The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.		
	(b)	or units extended stands when the latest the latest section of the	ne event that there is a breakdown of equipment pset of process in such a manner as to cause, or expected to cause, increased emissions of air aminants which are above an applicable dard, the person responsible for such equipment I notify the Director within 24 hours or the next sing day and provide a statement giving all inent facts, including the estimated duration of breakdown. The Director shall be notified when breakdown has been corrected.		
16.	Ope	ration	of Capture and Control Devices		
	whice oper emission the a	ch this cated at ssions of above e	ation control devices and capture systems for permit is issued shall be maintained and a all times in a manner so as to minimize the of air contaminants. Procedures for ensuring that equipment is properly operated and maintained so nize the emission of air contaminants shall be	§22-28-16(d), Code of Alabama 1975, as amended	

established.

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17.	Obno	xious	Odors	
	verific odoro the Al	dous of the double doub	ADEM Admin. Code R 335-3-108	
18.	<u>Fugit</u>	ive D	<u>ust</u>	
	(a)	emar	autions shall be taken to prevent fugitive dust nating from plant roads, grounds, stockpiles, ens, dryers, hoppers, ductwork, etc.	ADEM Admin. Code R 335-3-402
	(b) Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds:			
		(1)	By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;	
		(2)	By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;	
		(3)	By paving;	
		(4)	By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;	
	adequand g exclusion contro Altern	nately round sively ol tech native	or, or a combination, of the above methods fail to reduce airborne dust from plant or haul roads its, alternative methods shall be employed, either or in combination with one or all of the above iniques, so that dust will not become airborne. methods shall be approved by the Department dization.	
19.	Addit	ions a	and Revisions	
	modif	icatio	cations to this source shall comply with the n procedures in ADEM Admin. Code R.s 335-3-35-3-1614.	ADEM Admin. Code R 335-3-1613 and .14

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0.	Recordkeeping Requirements				
	(a)	Records of required monitoring information of the source shall include the following:	ADEM Admin. Code R 335-3-1605(c)2.		
		(1) The date, place, and time of all sampling or measurements;			
		(2) The date analyses were performed;			
		(3) The company or entity that performed the analyses;			
		(4) The analytical techniques or methods used;			
		(5) The results of all analyses; and			
		(6) The operating conditions that existed at the time of sampling or measurement.			
	(b)	Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit.			
1.	Reporting Requirements				
	(a)	Reports to the Department of any required monitoric shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All require reports must be certified by a responsible official consistent with ADEM Admin. Code R. 335-3-1604(9).	335-3-1605(c)3.		
	(b)	Deviations from permit requirements shall be reported within 48 hours or 2 working day of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.			

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22.	Emis	sion Testing Requirements	
	provious safety according 40 of	point of emission which requires testing will be ded with sampling ports, ladders, platforms, and other a equipment to facilitate testing performed in edance with procedures established by Part 60 of Title the Code of Federal Regulations, as the same may be ded or revised.	ADEM Admin. Code R. 335-3-105(3) and ADEM Admin. Code R. 335-3-104(1)
	in ad subm	air Division must be notified in writing at least 10 days vance of all emission tests to be conducted and litted as proof of compliance with the Department's air tion control ADEM Admin. Code R.s and regulations.	
	proce	oid problems concerning testing methods and dures, the following shall be included with the cation letter:	
	(1)	The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.	ADEM Admin. Code R. 335-3-104
	(2)	A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures require probe cleaning).	
	(3)	A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.	
	(4)	A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.	
	owne	test meeting may be held at the request of the source r or the Air Division. The necessity for such a meeting he required attendees will be determined on a case-by- basis.	ADEM Admin. Code R. 335-3-104
	30 da	st reports must be submitted to the Air Division within ays of the actual completion of the test unless an sion of time is specifically approved by the Air Division.	ADEM Admin. Code R. 335-3-105(3) and ADEM Admin. Code R. 335-3-104(1) ADEM Admin. Code R. 335-3-104 ADEM Admin. Code R. 335-3-104

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23.	Payn	nent o	f Emission Fees	
			ssion fees shall be remitted each year according chedule in ADEM Admin. Code R. 335-1-704.	ADEM Admin. Code R. 335-1-704
24.	Othe	r Repo		
	fuel a may pollu	analyse be requ tion co	of other reports regarding monitoring records, es, operating rates, and equipment malfunctions uired as authorized in the Department's air ontrol ADEM Admin. Code R.s and regulations. ment may require emission testing at any time.	ADEM Admin. Code R 335-3-104(1)
25 .	<u>Title</u>	VI Re	quirements (Refrigerants)	
	inclu Class 82, S and i pract recyc	ding ais II ozos Subpart mainta cices, p	having appliances or refrigeration equipment, ir conditioning equipment, which use Class I or ne-depleting substances as listed in 40 CFR Part t A, Appendices A and B, shall service, repair, in such equipment according to the work ersonnel certification requirements, and certified and recovery equipment specified in 40 CFR Part t F.	40 CFR 82
	No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F.			
	recor	dkeepi be sul	sible official shall comply with all reporting and ing requirements of 40 CFR 82.166. Reports omitted to the US EPA and the Department as	
26.	Cher	nical A		
	If a chemical listed in Table 1 of 40 CFR Part 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:			40 CFR Part 68
	(a)		owner or operator shall comply with the sions in 40 CFR Part 68.	
	(b)	The o	owner or operator shall submit one of the ving:	
		(1)	A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 § 68.10(a) or,	
		(2)	A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.	

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27 .	Disp	lay of Permit		
	at th locat	permit shall be kept under file or on display at all times e site where the facility for which the permit is issued is ted and will be made readily available for inspection by or all persons who may request to see it.	ADEM Admin. Code R. 335-3-1401(1)(d)	
28.	Circ	<u>umvention</u>		
	any or redu conc	erson shall cause or permit the installation or use of device or any means which, without resulting in ction in the total amount of air contaminant emitted, eals or dilutes any emission of air contaminant which d otherwise violate the Division 3 ADEM Admin. Code and regulations.	ADEM Admin. Code R. 335-3-110	
29.	Visit	ole Emissions		
	Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.		ADEM Admin. Code R. 335-3-401(1)	
30.	<u>Fuel</u>	-Burning Equipment		
	(a)	Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Part 335-3-403.	ADEM Admin. Code R. 335-3-403	
	(b)	Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Part 335-3-501.	ADEM Admin. Code R. 335-3-501	
31.	Proc	ess Industries – General		
	this	ss otherwise specified in the Unit Specific provisos of permit, no process may discharge particulate emissions access of the emissions specified in Part 335-3-404.	ADEM Admin. Code R. 335-3-404	
32 .	Aver	aging Time for Emission Limits		
	for tl	ss otherwise specified in the permit, the averaging time ne emission limits listed in this permit shall be the inal time required by the specific test method.	ADEM Admin. Code R. 335-3-105	

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	Compliance Assurance Monitoring (CAM)	40 CFR 64
	Conditions (a) through (d) that follow are general conditions applicable to emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the unit specific provisos and the attached CAM appendices.	
	(a) Operation of Approved Monitoring	40 CFR 64.7
(1)	Commencement of operation. The owner or operator shall conduct the monitoring required under this section and detailed in the unit specific provisos and CAM appendix of this permit (if required) upon issuance of the permit, or by such later date specified in the permit pursuant to §64.6(d).	
(2)	Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.	
(3)	Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.	
(4)	Response to excursions or exceedances. (a) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control	

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	practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (b) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.	
	Documentation of need for improved monitoring. After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Department and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.	
	(b) Quality Improvement Plan (QIP) Requirements	40 CFR 64.8
	Based on the results of a determination made under Section 33(a)(4)(b) above, the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with 40 CFR §64.6(c)(3), the permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a	

erally Enfo	rceable Provisos	Regulations
purposes emissions	lower percent or may rely on other criteria for of indicating whether a pollutant-specific s unit is being maintained and operated in a consistent with good air pollution control practices.	
(2) Elements	of a QIP:	
(a)	The owner or operator shall maintain a written QIP, if required, and have it available for inspection.	
(b)	The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:	
	i. Improved preventive maintenance practices.	
	ii. Process operation changes.	
	iii. Appropriate improvements to control methods.	
	iv. Other steps appropriate to correct control performance.	
	v. More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (2)(b)(i) through (iv) above).	
implemer notify the improven	s required, the owner or operator shall develop and at a QIP as expeditiously as practicable and shall a Department if the period for completing the nents contained in the QIP exceeds 180 days from on which the need to implement the QIP was ed.	
determina Departme	g implementation of a QIP, upon any subsequent ation pursuant to Section 33(a)(4)(b) above, the ent may require that an owner or operator make le changes to the QIP if the QIP is found to have:	
(a)	Failed to address the cause of the control device performance problems; or	
(b)	Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for	

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minimizing emissions.	
(5) Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.	
(c) Reporting and Recordkeeping Requirements	40 CFR 64.9
(1) General reporting requirements	
(a) On and after the date specified in Section 33(a)(1) above by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with ADEM Admin. Code R. 335-3-1605(c)3.	
(b) A report for monitoring under this part shall include, at a minimum, the information required under ADEM Admin. Code R. 335-3-1605(c)3. and the following information, as applicable:	
 i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken; 	
 ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and 	
 iii. A description of the actions taken to implement a QIP during the reporting period as specified in Section 33(b) above. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring. (2) General recordkeeping requirements. 	

(a) The owner or operator shall comply with the recordkeeping requirements specified in ADEM

ally Enfo	rceable Provisos	Regulations
	Admin. Code R. 335-3-1605(c)2 The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to Section 33(b) above and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).	
(b)	Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	
(d) Savin	gs Provisions	40 CFR 64.10
(1) No	othing in this part shall:	
co sta or fee rec pa me rec in pu ur me Ac iss or	recuse the owner or operator of a source from impliance with any existing emission limitation or andard, or any existing monitoring, testing, reporting recordkeeping requirement that may apply under deral, state, or local law, or any other applicable quirements under the Act. The requirements of this rt shall not be used to justify the approval of onitoring less stringent than the monitoring which is quired under separate legal authority and are not tended to establish minimum requirements for the arpose of determining the monitoring to be imposed ader separate authority under the Act, including onitoring in permits issued pursuant to title I of the transcription of a permit under title V of the Act, improved new monitoring at those emissions units where onitoring requirements do not exist or are inadequate meet the requirements of this part.	
to re- an pr se	estrict or abrogate the authority of the Department impose additional or more stringent monitoring, cordkeeping, testing, or reporting requirements on by owner or operator of a source under any ovision of the Act, including but not limited to ections 114(a)(1) and 504(b), or state law, as plicable.	
c. Re	estrict or abrogate the authority of the Department	

Federally Enforceable Provisos	Regulations
to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.	

Summary Page for EPS Casting/Molding Unit

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
001	EPS Casting and Molding with Baghouse	PM	The lesser of the Anti-PSD limit of 23.78 lb/hr or the allowable set by 17.31(P) ^{0.16}	ADEM Admin Code R. 335.3.4- .04 ADEM Admin Code R. 335.3.14- .04
001	EPS Casting and Molding with Baghouse	Styrene	N/A	N/A
001	EPS Casting and Molding with Baghouse	Benzene	N/A	N/A
001	EPS Casting and Molding with Baghouse	СО	N/A	N/A
001	EPS Casting and Molding with Baghouse	NO_{X}	N/A	N/A
001	EPS Casting and Molding with Baghouse	SO_2	N/A	N/A
001	EPS Casting and Molding with Baghouse	Opacity	(see general provisos)	SIP
001	EPS Casting and Molding with Baghouse	HAPs	N/A	N/A

Provisos for EPS Casting/Molding Unit

Federally Enforceable Provisos	Regulations
Applicability	
1. These units are subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-1603
2. This source is subject only to Adem Admin Code R. 335-3-404(1) "Control of Particulate Process Industries – General".	ADEM Admin. Code R. 335-3-404(1)
3. This source is subject to ADEM Admin. Code R. 335-3-401(1), "Control of Particulate Emissions – Visible Emissions".	ADEM Admin. Code R. 335-3-401(1)
4. The unit has an enforceable limit in order to prevent it from being subject to the provisions of ADEM Admin. Code R. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	ADEM Admin. Code R. 335-3-1404
5. The Lost Foam Casting Operation must comply with the applicable requirements of 40 CFR Part 63 Subpart ZZZZZZ, "National Emission Standards for Hazardous Air Pollutants for Aluminum, Copper and other Nonferrous Foundries" by June 27, 2011 or by alternative date established by Subpart ZZZZZZ.	40 CFR Part 63 Subpart ZZZZZZ
6. This source is subject to the applicable requirements of 40 CFR Part 64 "Compliance Assurance Monitoring". Pre-control potential particulate matter emissions exceed 100 TPY.	40 CFR Part 64
Emission Standards	
1. Particulate matter emissions from this unit shall not exceed the lesser of the Anti-PSD limit of 23.78 lb/hr as required by ADEM Admin Code R. 335-3-1404 or the allowable set by rule 335-3-404.	ADEM Admin. Code R. 335-3-1404
2. This unit shall not operate more than 4,800 hours in any consecutive twelve month period.	ADEM Admin. Code R. 335-3-1404
	or
	40 CFR Part
	§ 64.3(b)(4)(ii)
Compliance and Performance Test Methods and Procedures	
1. Method 5 of 40 CFR (Latest Edition) Part 60, Appendix A, or an equivalent method as approved by the Department shall be used in the determination of particulate emissions from the stack.	ADEM Admin. Code R. 335-3-104
2. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity of the stack emissions.	ADEM Admin Code R. 335-3-104

Federally Enforceable Provisos	Regulations
Emission Monitoring	
1. The Permittee shall perform the following inspections of the baghouse to verify proper operation.	ADEM Admin. Code R. 335-3-1605(c)(1)
The following activities shall be performed:	
(a) Once per week check hopper, fan, and cleaning cycle for proper operation.	
(b) Once per week a visual check of all hoods and ductwork.	
2. The Permittee shall perform the following inspections of the baghouse to verify proper operation.	ADEM Admin. Code R. 335-3-1605(c)(1)
The following activities shall be performed:	
(a) Once per year inspect baghouse structure, access doors, door seals, and bags.	
(b) Once per year perform an internal inspection of the baghouse hoppers.	
Recordkeeping and Reporting Requirements	
1. The source shall maintain a record of all inspections performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.	ADEM Admin. Code R. Rule 335-3-1605(c)(3)
2. This source is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring" to include the Reporting and Recordkeeping Requirements in §64.9.	40 CFR Part 64 - CAM
3. The Permittee shall record the baghouse pressure daily. Any deviations from the pressure range shall be documented along with the corrective action and reported to the Department within two (2) working days. Each record shall be maintained for a period of 5 years.	40 CFR PART 64 - CAM
4. Records of monthly and 12-month total of the hours of operation shall be recorded in a form suitable for inspection and these records shall be maintained for a minimum of 5 years.	40 CFR Part 64 – CAM

Summary Page for Two Aluminum Melting Furnaces

Permitted Operating

Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
002	Two Natural Gas Aluminum Melting Furnaces	PM	The lesser of the Anti-PSD limit of 3.74 lb/hr or the allowable set by 3.59(P) ^{0.62}	N/A
002	Two Natural Gas Aluminum Melting Furnaces	Opacity	General Provisos	SIP
002	Two Natural Gas Aluminum Melting Furnaces	SO ₂	N/A	N/A
002	Two Natural Gas Aluminum Melting Furnaces	NO_{X}	N/A	N/A
002	Two Natural Gas Aluminum Melting Furnaces	СО	N/A	N/A
002	Two Natural Gas Aluminum Melting Furnaces	VOC	N/A	N/A

Provisos for Two Aluminum Melting Furnaces

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-1603
2. This source is subject only to Adem Admin Code R. 335-3-404(1) "Control of Particulate Process Industries – General".	ADEM Admin. Code R. 335-3-404(1)
3. This source is subject to ADEM Admin. Code R. 335-3-401(1), "Control of Particulate Emissions – Visible Emissions".	ADEM Admin. Code R. 335-3-401(1)
4. The unit has an enforceable limit in order to prevent it from being subject to the provisions of ADEM Admin. Code R. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	ADEM Admin. Code R. 335-3-1404
Emission Standards	
1. Particulate matter emissions from this unit shall not exceed the lesser of the Anti-PSD limit of 3.74 lb/hr as required by ADEM Admin Code R. 335-3-1404 or the allowable set by rule 335-3-404.	ADEM Admin. Code R. 335-3-1404
2. Only clean metal such as "pigs", foundry returns, and similar types of clean aluminum shall be charged or melted in the furnaces	ADEM Admin. Code R. 335-3-1605
Compliance and Performance Test Methods and Procedures	
1. Method 5 of 40 CFR (Latest Edition) Part 60, Appendix A, or an equivalent method as approved by the Department shall be used in the determination of particulate emissions from the stack.	ADEM Admin. Code R. 335-3-104
2. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity of the stack emissions.	ADEM Admin Code R. 335-3-104
Emission Monitoring	
1. The facility shall perform a visual check, once per day, of the stack associated with this unit. This check shall be performed by a person familiar with method 9. If the instantaneous opacity of emissions in excess of 10% are noted, and are not corrected within a period of 1 hour, then a method 9 must be performed within 4 hours of the observations. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	ADEM Admin. Code R. 335-3-1605(c)(3)

Federally Enforceable Provisos	Regulations
Recordkeeping and Reporting Requirements	
1. The facility shall maintain a record of all inspections, to include visible observations and Method 9 observations performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.	ADEM Admin. Code R. 335-3-1605(c)(3)
2. If a visible emission observation is required using the 40 CFR, Part 60, Appendix A, Method 9, the results will be documented using an ADEM visible emissions observation report and the cause and corrective action taken will be documented in a form suitable for inspection.	ADEM Admin. Code R. 335-3-1605(c)(3)

Summary Page for Three Shotblast Machines

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
001	Goff Shotblast Machine with Baghouse	PM	The lesser of the Anti-PSD limit of 15.52 lb/hr or the allowable set by 3.59(P) ^{0.62}	ADEM Admin Code R. 335.3.404 ADEM Admin Code R. 335.3.1404
001	DeLong Shotblast Machine with Baghouse	PM	3.59(P) ^{0.62}	ADEM Admin Code R. 335.3.404
001	Bronco Shotblast Machine with Baghouse	PM	3.59(P) ^{0.62}	ADEM Admin Code R. 335.3.404
001	Goff, DeLong, and Bronco Shotblast Machines with Baghouse	Opacity	General provisos	SIP

Provisos for Three Shotblast Machines

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-1603
2. This source is subject only to Adem Admin Code R. 335-3-404(1) "Control of Particulate Process Industries – General".	ADEM Admin. Code R. 335-3-404(1)
3. This source is subject to ADEM Admin. Code R. 335-3-401(1), "Control of Particulate Emissions – Visible Emissions".	ADEM Admin. Code R. 335-3-401(1)
4. The Goff Shotblast has an enforceable limit in order to prevent it from being subject to the provisions of ADEM Admin. Code R. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	ADEM Admin. Code R. 335-3-1404
5. This source is subject to the applicable requirements of 40 CFR Part 64 "Compliance Assurance Monitoring". Pre-control potential particulate matter emissions exceed 100 TPY.	40 CFR Part 64
Emission Standards	
1. Particulate matter emissions from the Goff Shotblast machine shall not exceed the lesser of the Anti-PSD limit of 15.52 lb/hr as required by ADEM Admin Code R. 335-3-1404 or the allowable set by rule 335-3-404.	ADEM Admin. Code R. 335-3-1404
2. Particulate matter emissions from the Delong Shotblast machine shall not exceed the allowable as set by rule 335-3-404.	ADEM Admin. Code R. 335-3-1404
3. Particulate matter emissions from the Bronco Shotblast machine shall not exceed the allowable as set by rule 335-3-404.	ADEM Admin. Code R. 335-3-1404
Compliance and Performance Test Methods and Procedures	
1. Method 5 of 40 CFR (Latest Edition) Part 60, Appendix A, or an equivalent method as approved by the Department shall be used in the determination of particulate emissions from the stack.	ADEM Admin. Code R. 335-3-104
2. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity of the stack emissions.	ADEM Admin Code R. 335-3-104
Emission Monitoring	
1. The Permittee shall perform the following inspections of the baghouse to verify proper operation.	ADEM Admin. Code R. 335-3-1605(c)(1)

Federally Enforceable Provisos		Enforceable Provisos	Regulations
	The	following activities shall be performed:	
	(a)	Once per week check hopper, fan and cleaning cycle for proper operation.	
	(b)	Once per week a visual check of all hoods and ductwork.	
2.		rmittee shall perform the following inspections of the use to verify proper operation.	ADEM Admin. Code R. 335-3-1605(c)(1)
	The	e following activities shall be performed:	
	(a)	Once per year inspect baghouse structure, access doors, door seals, and bags.	
	(b)	Once per year perform an internal inspection of the baghouse hoppers.	
Re	ecordkee	ping and Reporting Requirements	
1.	to satis	arce shall maintain a record of all inspections performed of the requirements of periodic monitoring. This shall e all problems observed and corrective actions taken. ecord shall be maintained for a period of 5 years.	ADEM Admin. Code R. Rule 335-3-1605(c)(3)
2.	Part 64	ource is subject to the applicable requirements of 40 CFR r, "Compliance Assurance Monitoring" to include the ing and Recordkeeping Requirements in §64.9.	40 CFR Part 64 - CAM
3.	deviation with the within	rmittee shall record the baghouse pressure daily. Any ons from the pressure range shall be documented along the corrective action and reported to the Department two (2) working days. Each record shall be maintained the eriod of 5 years.	40 CFR PART 64 - CAM

Summary Page for Thermal Reclamation Unit

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
001	Thermal Reclamation Unit with Baghouse	PM	3.59(P) ^{0.62}	ADEM Admin Code R. 335.3.404
001	Thermal Reclamation Unit with Baghouse	Styrene	N/A	N/A
001	Thermal Reclamation Unit with Baghouse	Benzene	N/A	N/A
001	Thermal Reclamation Unit with Baghouse	HAPs	N/A	N/A
001	Thermal Reclamation Unit with Baghouse	Opacity	General provisos	SIP

Provisos for Thermal Reclamation Unit

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-1603
2. This source is subject only to Adem Admin Code R. 335-3-404(1) "Control of Particulate Process Industries – General".	ADEM Admin. Code R. 335-3-404(1)
3. This source is subject to ADEM Admin. Code R. 335-3-401(1), "Control of Particulate Emissions – Visible Emissions".	ADEM Admin. Code R. 335-3-401(1)
Emission Standards	
1. Particulate matter emissions from this unit shall not exceed the allowable as set by rule 335-3-404.	ADEM Admin. Code R. 335-3-1404
Compliance and Performance Test Methods and Procedures	
1. Method 5 of 40 CFR (Latest Edition) Part 60, Appendix A, or an equivalent method as approved by the Department shall be used in the determination of particulate emissions from the stack.	ADEM Admin. Code R. 335-3-104
2. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity of the stack emissions.	ADEM Admin Code R. 335-3-104
Emission Monitoring	
1. The facility shall perform a visual check, once per day, of the stack associated with this unit. This check shall be performed by a person familiar with method 9. If the instantaneous opacity of emissions in excess of 10% are noted, and are not corrected within a period of 1 hour, then a method 9 must be performed within 4 hours of the observations. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	ADEM Admin. Code R. 335-3-1605(c)(1)
2. The facility shall establish a normal operating pressure drop range and shall monitor and record the pressure drop across the baghouse once per day.	ADEM Admin. Code R. 335-3-1605(c)(3)
3. The Permittee shall perform the following inspections of the baghouse to verify proper operation.	ADEM Admin. Code R. 335-3-1605(c)(3)
The following activities shall be performed:	
(a) Once per week check hopper, fan and cleaning cycle for proper operation.	
(b) Once per week a visual check of all hoods and ductwork.	
4. The Permittee shall perform the following inspections of the 30	ADEM Admin. Code R.

Regulations
335-3-1605(c)(3)
ADEM Admin. Code R. 335-3-1605(c)(3)
ADEM Admin. Code R. 335-3-1605(c)(3)
ADEM Admin. Code R. 335-3-1605(c)(3)

Summary Page for Foam Pattern Making Process

Permitted

Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
003	Foam Pattern Making Process	PM	3.59(P) ^{0.62}	ADEM Admin Code R. 335.3.404
003	Foam Pattern Making Process	СО	N/A	N/A
003	Foam Pattern Making Process	NO _X	N/A	N/A
003	Foam Pattern Making Process	SO_2	N/A	N/A
003	Foam Pattern Making Process	Opacity	General Provisos	SIP
FUG1	Foam Pattern Making Process	VOC	N/A	N/A

Provisos for Foam Pattern Making Process

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-1603
Emission Standards	
1. This Source is subject to no additional specific requirements other those listed in the General Permit Provisos.	N/A
Compliance and Performance Test Methods and Procedures	
1. This source is subject to no additional specific requirements other than those listed in the General Permit Provisos	N/A
Emission Monitoring	
1. This Source is subject to no additional specific requirements other those listed in the General Permit Provisos.	N/A
Recordkeeping and Reporting Requirements	
1. This Source is subject to no additional specific requirements other those listed in the General Permit Provisos.	N/A

APPENDIX A

40 CFR 64

Compliance Assurance Monitoring (CAM)

MONITORING APPROACH: EPS Casting/Molding Unit

	Indicator 1	Indicator 2
I. Indicator	Differential Pressure	Visible Emission
Measurement Approach	Measured using a Magnehelic Differential Pressure Gauge	Visual inspection of the baghouse stack
II. Indicator Range	While the unit is operation, an excursion is defined as a pressure differential below 2.0 inches of H_2O or greater than 7.0 inches of H_2O . Excursions trigger an inspection, corrective action and a reporting requirement.	Baghouse stack visual emission opacity should be less than 5%. Excursions of opacity shall not exceed 10% for more than 4 hrs. Excursions trigger an inspection, corrective action, and a reporting requirement. If an excursion is noted and not corrected within a period of one hour, then a method 9 must be performed with four hours of the observation.
III. Performance Criteria	The pressure gauge	Baghouse shell is visually
Data Representativeness	measures the pressure differential between the inlet and outlet of the baghouse.	inspected for deterioration. If needed, it is repaired or replaced. Broken or leaking filter bags are replaced.
Verification of Operation Status	Not applicable	Not applicable
QA/QC Practices and Criteria	The pressure gauge shall be calibrated annually. If abnormal pressure is found, the gauge shall be inspected and corrected or replaced.	Opacity readings shall be taken by a person fully trained and qualified according to EPA standards. Gauge calibration shall be conducted when erratic reading are displayed, or at least annually.
Monitoring Frequency	The pressure differential shall be monitored and logged daily.	The complete Baghouse Unit shall be inspected at least annually. The visual emission shall be performed daily.

Data Collection Procedures	The pressure differential will be recorded with the time, date, and name of the observer.	A record of the results of the Baghouse inspection shall be kept with the time, date, bags condition and number replaced.
Averaging Period	Instantaneous	Instantaneous

MONITORING APPROACH: Three Shotblast Machines

	Indicator 1	Indicator 2
I. Indicator	Differential Pressure	Visible Emission
Measurement Approach	Measured using a Magnehelic Differential Pressure Gauge	Visual inspection of the baghouse stack
II. Indicator Range	While the unit is operation, an excursion is defined as a pressure differential below 2.0 inches of H_2O or greater than 7.0 inches of H_2O . Excursions trigger an inspection, corrective action and a reporting requirement.	Baghouse stack visual emission opacity should be less than 5%. Excursions of opacity shall not exceed 10% for more than 4 hrs. Excursions trigger an inspection, corrective action, and a reporting requirement. If an excursion is noted and not corrected within a period of one hour, then a method 9 must be performed with four hours of the observation.
III. Performance Criteria Data Representativeness	The pressure gauge measures the pressure differential between the inlet and outlet of the baghouse.	Baghouse shell is visually inspected for deterioration. If needed, it is repaired or replaced. Broken or leaking filter bags are replaced.
Verification of Operation Status	Not applicable	Not applicable
QA/QC Practices and Criteria	The pressure gauge shall be calibrated annually. If abnormal pressure is found, the gauge shall be inspected and corrected or replaced.	Opacity readings shall be taken by a person fully trained and qualified according to EPA standards. Gauge calibration shall be conducted when erratic reading are displayed, or at least annually.
Monitoring Frequency	The pressure differential shall be monitored and logged daily.	The complete Baghouse Unit shall be inspected at least annually. The visual emission shall be performed daily.

Data Collection Procedures	The pressure differential	A record of the results of
	will be recorded with the	the Baghouse inspection
	time, date, and name of the	shall be kept with the time,
	observer.	date, bags condition and
		number replaced.
		-
Averaging Period		
	Instantaneous	
		Instantaneous